

FILED

AUG 16 2023
U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.) No.
)
MOHSEN AKBARI,)
)
Defendant.)

4:23-cr-00421-SEP-RHH

MOTION FOR PRE-TRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its attorneys, Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, and Kyle T. Bateman, Assistant United States Attorney for said District, and moves the Court to order defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, Section 3141, et seq.

As and for its grounds, the Government states as follows:

1. There is a serious risk that the defendant will flee; and
2. The defendant is a threat to the community.

The defendant is a citizen of Canada with no known ties to the Eastern District of Missouri. Since March 2023, the defendant has been in the United States as a visitor as part of the visa waiver program on an admission that expires on August 28, 2023. After that date, the defendant has no legal right to remain in the United States. Since January 2022, the defendant has entered the United States three times via commercial air from Canada, Turkey, and South Korea. His two previous departures from the United States were also via commercial air to Turkey and Japan.

Since March 2023, the defendant has engaged in a transnational crime spree that involves over 60 known thefts from Walmart retail stores. Most of these stolen funds have been wired internationally

to Canada and to an Iranian citizen lawfully present in the United States, an Iranian born Canadian citizen lawfully present in the United States, and a United States citizen who previously sponsored an Iranian citizen for a fiancé visa.

WHEREFORE, there are no conditions or combination of conditions that will reasonably assure defendant's appearance as required and the safety of any other person and the community and the Government requests this Court to order defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of defendant's initial appearance.

Respectfully submitted,

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